

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED SECRETARY OF STATE
ANTONY BLINKEN, *et al.*

Nominal Defendants.

CIVIL NO: 3:22-cv-00049-NKM-JCH

[PROPOSED] ORDER GRANTING MOTION TO COMPEL

Having reviewed the motion seeking an order to compel Plaintiffs to produce all responsive, non-privileged documents to Defendant Richard Mast's Request to Produce Documents, and having further reviewed all filings in support of and in opposition to the motion, the Court finds that good cause exists for the Court to grant the motion, and the motion to compel is hereby **GRANTED** and the Court **ORDERS** Plaintiffs to produce all responsive, non-privileged documents to Defendant Mast within 5 days of this order, and the Court further and more specifically **ORDERS** (1) that Plaintiffs and their counsel certify that all non-privileged and responsive documents have been produced; (2) that Plaintiffs produce all of the items listed on the June 8 privilege log based upon the involvement of Martha Jenkins and Carolina Velasquez; (3) that Plaintiffs turn over items identified at numbers 2 and 11-12 for the Court's *in camera* inspection; and (4) that Plaintiffs properly identify the specific request for production to which a document was produced for each of Plaintiffs' Production Nos. 1-4 and 8 within 5 days of this order. The Court further **ORDERS** movant to present evidence of his expenses, including attorney's fees, incurred in making the motion, including the

futile meet-and-confer effort leading to the motion, pursuant to Rule 37(a)(5)(A), within 14 days of the entry of this order. Plaintiffs shall file any opposition to the showing of expenses seven days thereafter and the movant shall reply within three court days following Plaintiffs' filing.

SO ORDERED.

Dated: _____

Magistrate Judge Joel C. Hoppe